

LAW OFFICES OF  
THOMAS F. LIOTTI, LLC  
600 OLD COUNTRY ROAD - SUITE 530  
GARDEN CITY, NEW YORK 11530

-----  
TELEPHONE: (516) 794-4700  
FACSIMILE: (516) 794-2816  
WEBSITE: www.tliotti.com

THOMAS F. LIOTTI✧

LUCIA MARIA CIARAVINO\*

SARA V. SALMERON

\*Also Admitted in CT

KATURIA D'AMATO

Of Counsel

JEAN LAGRASTA

ELLEN LUXMORE

Paralegals

Sent via ECF only

September 4, 2019

Hon. Colleen McMahon  
Chief Judge  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: Cummings v. The City of New York, et al  
Case No.: 19-cv-07723-CM  
Plaintiff's Opposition/Responsive Papers Due: 09/06/2019

Dear Judge McMahon:

My office represents the plaintiff, Patricia Cummings, in connection with the above-referenced action.

I am writing to respectfully request a two (2) week extension of time for the plaintiff to file and serve opposition papers to the multiple motions to dismiss made by the defendants. There are currently four (4) motions to dismiss the plaintiffs complaint made on behalf of:

(1) the "City" defendants (consisting of The City of New York, New York City Department of Education, City of New York Office of Special Investigations, NYC Mayor Bill DeBlasio, Giulia Cox, Courtney Ware, Councilman Jumaane D. Williams and Councilman Daniel Dromm);

(2) defendants Daily News, L.P. (sued herein as New York Daily News) and Ben Chapman;

**LAW OFFICES OF THOMAS F. LIOTTI, LLC**

September 4, 2019

To: Hon. Colleen McMahon, Chief Judge  
United States District Court - Southern District of New York

Re: Cummings v. The City of New York, et al  
Case No.: 19-cv-07723-CM

---

(3) defendants Dr. Andre Perry and The Hechinger Report a/k/a Hechinger  
Institute On Education And The Media; and

(4) defendant Lenard Larry McKelvey a/k/a Charlamagne Tha God.

As there are numerous defendants, the plaintiff must address and oppose the specific allegations made by each defendant in support of his/her/their motion to dismiss. This is a very intricate case involving violations of the plaintiff's civil rights and libelous and slanderous accusations made against her.

Further, my firm has had a congested court appearance calendar and depositions. My Associate, Lucia Ciaravino, Esq., who is assisting me in this matter, is scheduled to continue a trial tomorrow, September 5, 2019, in the Nassau County Family Court, in the matter of Alisa Jones v. Michael Jones, File No. 607346, Docket No(s): F-06794-18/18C and F-06794-18/19D.

Based on all of the foregoing, I respectfully request that the time for the plaintiff to submit opposition/responsive papers to the multiple motions to dismiss be extended for two (2) weeks, to and including **September 20, 2019**, with the defendants time to submit reply papers extended from September 25, 2019 to October 9, 2019. This is the first request for an extension of time requested by the plaintiff.

There will be no prejudice to any of the defendants if this extension of time is granted to the plaintiff. However, the penalty to the plaintiff will be unduly harsh if the extension is denied.

Thanking the Court for its consideration of this request, I am

Respectfully,

A handwritten signature in black ink, appearing to read "Thomas F. Liotti", with a long horizontal flourish extending to the right.

Thomas F. Liotti (TL 4471)

jml

cc: Counsel for Appearing Defendants (via ECF)